



PEOPLE FOR
THE ETHICAL
TREATMENT
OF ANIMALS

January 30, 2019

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Acting Director
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Office of Laboratory Animal Welfare
National Institutes of Health
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Via e-mail: brent.morse@nih.gov

Dear Dr. Morse,

I am writing on behalf of People for the Ethical Treatment of Animals (PETA) and our more than 6.5 million members and supporters to request that your office investigate possible noncompliance with the Public Health Service Policy on Humane Care and Use of Laboratory Animals (PHS Policy) and the *Guide for the Care and Use of Laboratory Animals* (the *Guide*) related to the use and treatment of hamsters at Morehouse School of Medicine (Morehouse; PHS Assurance # D16-00537) in Atlanta, Georgia.

On December 12, 2018, the U.S. Department of Agriculture (USDA) issued an [inspection report](#) to Morehouse, documenting egregious violations of the federal Animal Welfare Act. It appears that several of the issues raised in the USDA's report—including failure to adhere to the animal use protocol approved by the Institutional Animal Care and Use Committee (IACUC), failure to provide adequate veterinary care to animals, failure to maintain records, and failure to ensure adequate training and instruction to personnel—may also indicate noncompliance with PHS Policy and the *Guide*.

The USDA's report describes an incident in which “[t]wo hamsters were severely injured during a social defeat model session conducted by a student researcher on/about 6/21/18.” As you know, the “social defeat model” involves using social conflict between members of the same species to deliberately generate emotional and psychological stress. A male animal is introduced into the home cage of a dominant, aggressive male—and the “intruder” is quickly attacked and forced into subordination. The defeated male emits frequent calls of distress, assumes a submissive posture, and exhibits freezing behavior.

According to the USDA's report, at Morehouse, the student experimenter “left the hamsters in the same cage for the full five minutes of the defeat session” and failed to separate them “based on the aggressive actions exhibited by the hamsters”—as had been specified in, and was required by, the IACUC-approved protocol. Moreover, the USDA's report documents that the student failed to keep “adequate procedural records and was not adequately trained in identifying and reporting hamster health issues.”

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As a result of these failures, both hamsters died. The first hamster (identified as 18-12) died in his cage and was discovered by veterinary staff the same day that the experiment took place. The second hamster was “found by veterinary staff to have multiple fight wounds on [his] back, neck and haunches and was noted to be extremely lethargic and grinding his teeth” on June 22, 2018 (the day after the experiment took place). Although this hamster was treated by veterinary staff, he was found dead in his cage the following day, on June 23, 2018.

As detailed below, we believe the lapses described in the USDA’s report reflect serious noncompliance with PHS Policy and the *Guide*.

I. The Institutional Animal Care and Use Committee

The *Guide* states that the IACUC is “responsible for assessment and oversight of the institution’s Program components and facilities” and includes “ongoing assessment of animal care and use.” Moreover, it is the responsibility of the IACUC to review any proposed use of animals, with consideration to the potential of protocols “to cause pain or distress” to animals.

However, in failing to separate the hamsters in a timely manner, the student experimenter deviated from the protocol approved by the IACUC. As a consequence, the hamsters experienced increased pain and distress; and the deviation likely also contributed to the animals’ deaths. Given that the student experimenter was likely listed in the protocol as one of the individuals who would be involved in carrying out the “social defeat” study, the Principal Investigator, members of his/her staff, veterinary staff, animal care staff, and/or members of the IACUC should have been present to provide the “ongoing assessment of animal care and use” required by the *Guide*.

II. Provision of Adequate Veterinary Care, Recordkeeping, and Training of Personnel

The *Guide* states that facilities must maintain an “adequate veterinary care program,” including “effective management” of “pain and distress.” On the latter point, the *Guide* directs that “animals should be observed for signs of illness, injury, or abnormal behavior” and procedures for diagnosis and therapy “should be those currently accepted in veterinary and laboratory animal practice.” The *Guide* further advises that: “[m]edical records are a key element of the veterinary care program and are considered critical for documenting animal well-being as well as tracking animal care and use at a facility.” Lastly, the *Guide* specifies that all “personnel involved with the care and use of animals must be adequately educated, trained, and/or qualified ... to help ensure ... animal well-being.”

However, according to the USDA’s report, it appears that the student was “not adequately trained in identifying and reporting hamster health issues.” As a result, the student failed to separate the hamsters in a timely fashion; failed to report that the hamster identified as 18-12 required veterinary care in a timely fashion; failed to document the extensive fight wounds suffered by the second hamster; and failed to maintain adequate procedural records. It was determined that the student had been inadequately trained before they were permitted to carry out an experiment that caused imaginable physical and psychological suffering to the hamsters.

We urge your office to treat this matter with gravity and respond swiftly to investigate and take appropriate disciplinary action. If you determine that the incidents described in the USDA’s

report comprise noncompliance with PHS Policy and the *Guide*, we ask that you demand repayment of any federal monies that may have been used in the conduct of the problematic activities.

Thank you for your consideration of our concerns. I look forward to receiving your response.

Sincerely,

A handwritten signature in black ink, appearing to read "Alka Chandna". The signature is fluid and cursive, with the first name "Alka" and last name "Chandna" clearly distinguishable.

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